**IN THE UNITED STATES DISTRICT COURT**
**FOR THE WESTERN DISTRICT OF TEXAS**
**WACO DIVISION**

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|---|---|---|
| UNILOC 2017 LLC,<br><br>    Plaintiff,<br><br>v.<br><br>APPLE INC.,<br><br>    Defendant. | §<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§<br>§ | Civil Action No. 6:19-cv-532-ADA<br><br><br>PATENT CASE<br><br><br>JURY TRIAL DEMANDED |

**DECLARATION OF JOHN M. GUARAGNA IN SUPPORT OF APPLE INC.'S**
**MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

I, John M. Guaragna, hereby declare as follows:

1.  I am an attorney at DLA Piper LLP (US), counsel of record in this action for Defendant Apple Inc.  I am a member of the Bar of the State of Texas and have been admitted to practice before this Court.  I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2.  Attached as Exhibit 1 is a true and correct copy of the Memorandum Order and Opinion [Dkt. No. 104] in *Uniloc v. Apple*, 2:17-CV-00258 (EDTX), granting Apple's Inc.'s Motion to Transfer Venue to the Northern District of California.

3.  Attached as Exhibit 2 is a true and correct copy of Excerpts from Deposition of Drake Turner, dated January 15, 2019.

4.  Attached as Exhibit 3 is a true and correct copy of the Declaration of Amanda Tekell [Dkt. No. 103] filed in *Uniloc USA, Inc. et al. v. Google LLC* (Oct. 17, 2019).

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5.      Attached as Exhibit 4 is a true and correct copy of the Redacted Version of Apple Motion to Dismiss [Dkt. No. 168-3] in *Uniloc USA et al v. Apple Inc.*, No. 3:18-cv-00360-WHA, (N.D. Cal.), filed on October 25, 2018.

6.      Attached as Exhibit 5 is a true and correct copy of search results showing the distance from Cupertino, California to San Jose, California and from Cupertino, California to Waco, Texas using Google Maps.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this 12th day of November, 2019, in Austin, Texas.


                        */s/ John M. Guaragna*
                        John M. Guaragna